

March 19, 2007

John Morris
Rubber and Plastic Additives Panel
The American Chemistry Council
1300 Wilson Boulevard
Arlington, VA 22209

Dear Mr. Morris:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the revised test plan and robust summaries for 4-methylphenol, reaction products with dicyclopentadiene and isobutylene, dated July 11, 2003. EPA posted the revised submission on the ChemRTK HPV Challenge Program Web site on September 1, 2004. The submission is a partial revision of the previously submitted category for the Hindered Phenols posted January 15, 2002. I commend the ACC Rubber and Plastic Additives (RAPA) Panel for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that the RAPA Panel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact me at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsc hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Mark W. Townsend, Chief
HPV Chemicals Branch

Enclosure

cc: O. Hernandez
C. Augustyniak
J. Willis

**EPA Comments on Chemical RTK HPV Challenge Submission:
4-Methylphenol, reaction products with dicyclopentadiene and isobutylene**

SUMMARY OF EPA COMMENTS

The sponsor, the Rubber and Plastic Additives (RAPA) Panel of the American Chemistry Council, submitted a revised test plan and robust summaries to EPA for 4-methylphenol, reaction products with dicyclopentadiene and isobutylene dated July 11, 2003, in response to EPA's comments on its original submission for the Hindered Phenols Category. EPA posted the submission on the ChemRTK HPV Challenge Web site on September 1, 2004. This submission is a partial revision of the previously submitted category for Hindered Phenols that was dated December 18, 2001.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical properties. The submitted data for these endpoints except boiling point are adequate for the purposes of the HPV Challenge Program. The submitter needs to provide a boiling point value.
2. Environmental Fate. The discussion of stability in water needs revision. The submitter needs to provide estimated data for the photodegradation and fugacity endpoints. For biodegradation, the numerical results need to be included in the robust summary.
3. Health Effects. The submitted data are adequate for the purposes of the HPV Challenge Program.
4. Ecological Effects. The submitted data for all three acute toxicity endpoints are adequate for the purposes of the HPV Challenge Program. However, given the high octanol-water partition coefficient for the sponsored substance, EPA recommends that the submitter provide data from a chronic Daphnia test.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

EPA COMMENTS ON 4-METHYLPHENOL, REACTION PRODUCTS WITH DICYCLOPENTADIENE AND ISOBUTYLENE CHALLENGE SUBMISSION

Test Plan

The submitter needs to indicate the range for "X" in the chemical structure in the test plan and any available composition data if the sponsored substance is a mixture. EPA's comments assume that X = 1.

Physicochemical properties (melting point, boiling point, vapor pressure, partition coefficient, and water solubility)

Data submitted for the melting point, vapor pressure, partition coefficient, and water solubility endpoints are adequate for the purposes of the HPV Challenge Program.

Boiling point. The submitter needs to provide a boiling or decomposition point. Boiling point values below 300 °C need to be measured; values over 300 °C may be calculated for the purposes of the HPV Challenge Program. The submitter needs to replace the "NA" or "Not relevant" statements in Table 1 of the test plan and in the robust summary.

Environmental Fate (photodegradation, stability in water, biodegradation, and fugacity)

Stability in water. The statement as to lack of susceptibility to hydrolysis needs to emphasize the lack of reactive functional groups, rather than the low water solubility (test plan discussion and robust summary).

Photodegradation and Transport and distribution (fugacity). The submitter needs to include estimated values for these endpoints in the robust summaries and not leave these sections blank or containing "Not relevant" statements.

Biodegradation. The robust summary needs to include the numerical results of the study.

Health Effects (acute toxicity, repeated-dose toxicity, genetic toxicity, and reproductive/developmental toxicity)

The submitted data for all endpoints are adequate for the purposes of the HPV Challenge Program.

Ecological Effects (fish, invertebrates, and algae)

The submitted data for all three acute toxicity endpoints are adequate. However, given the high octanol- water partition coefficient ($\log K_{ow} = 7.17\text{--}8.17$) for the sponsored substance, EPA recommends that the submitter provide data from a chronic Daphnia test.

Specific Comments on the Robust Summaries

No Comments.

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.